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Attorneys for Plaintiff JENS ERIK SORENSEN,  
as Trustee of SORENSEN RESEARCH AND  
DEVELOPMENT TRUST

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JENS ERIK SORENSEN, as Trustee of	)	Case No. CV 075525 JSW
SORENSEN RESEARCH AND	)	
DEVELOPMENT TRUST,	)	<b>AFFIDAVIT OF MELODY A.</b>
	)	<b>KRAMER IN SUPPORT OF</b>
Plaintiff	)	<b><u>RENEWED</u> REQUEST FOR ENTRY</b>
v.	)	<b>OF DEFAULT and DEFAULT</b>
	)	<b>JUDGMENT AGAINST</b>
FIRST INTERNATIONAL DIGITAL,	)	<b>DEFENDANT FIRST</b>
INC. an Illinois corporation; and DOES 1-	)	<b>INTERNATIONAL DIGITAL, INC.</b>
100,	)	
	)	
Defendants.	)	

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1 I, MELODY A. KRAMER, declare:

2 1. I am not a party to the present action. I am over the age of eighteen. I  
3 have personal knowledge of the facts contained within the following paragraphs, and  
4 could and would competently testify thereto if called as a witness in a court of law.

5 2. At all times relevant herein I have been an attorney for Defendant  
6 Sorensen Research and Development Trust ("SRDT"), Plaintiff in the above-  
7 captioned matter.

8 3. This Declaration is being submitted in conjunction with Plaintiff's  
9 Request for Default and Default Judgment Against Defendant First International  
10 Digital, Inc.

11 4. According to Court records, Defendant First International Digital, Inc.  
12 has failed to answer or otherwise respond to the Complaint in this case. This is  
13 consistent with the representation of counsel for First International Digital, Inc. who  
14 advised me orally and in writing prior to the answer date that no responsive pleading  
15 would be filed.

16 5. The Complaint in this matter requested a sum certain for patent  
17 infringement, specifically, One Million Five Hundred Thousand Dollars  
18 (\$1,500,000.00) (see paragraph 113 of allegations and paragraph f of Prayers for  
19 Relief).

20 6. Plaintiff is entitled to the requested dollar amount based upon  
21 calculations of reasonably royalties on sales of the accused infringing products  
22 given to Plaintiff by First International Digital, Inc. pre-litigation.

23 7. In addition, Plaintiff has expended \$356.96 in costs (\$350.00 filing fee,  
24 and \$6.96 certified mail service fee).

25 8. Furthermore, Plaintiff's counsel (the undersigned) has expended 6.7  
26 hours at a reasonable hourly rate of \$375.00/hour in preparing the pleadings in this  
27 case, including the Request for Default, and reviewing other court filings for a total  
28 attorney fee amount of \$2,512.50.

1  
2 SWORN TO under penalty of perjury of the laws of the State of California  
3 and the United States, this 4<sup>th</sup> day of January, 2008.  
4  
5

6 /s/ Melody A. Kramer  
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8 Melody A. Kramer, Esq.  
9 Attorney for Plaintiff  
mak@kramerlawip.com  
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